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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

KERMIT BAYLESS,  
  
Plaintiff,

v.

CLARK COUNTY SCHOOL DISTRICT, a  
Nevada Public Governmental Entity;  
BRITTNEY NUANEZ, an individual;  
KATHERINE EVANS, an individual;  
SARAH HAMILTON, an individual;  
THITIYA KARAMOOZ, an individual;  
RACHELLE DUGGINS-TETLOW, an  
individual; REECE OSWALT, an individual;  
WALTER HANNA, an individual; ZACK  
HARLAN, an individual; CEDRIC COLE, an  
individual; CHRISTIE ANN GUIDA, an  
individual; CHRISTOPHER KLEMP, an  
individual; MOLLIE HALL, an individual;  
DOES Individuals, I through XX, inclusive;  
and, ROE CORPORATIONS AND  
BUSINESS ENTITIES I through XX,  
inclusive,

Defendants.

Case No.: 2:25-cv-00050-JAD-MDC

**STIPULATION AND ORDER  
EXTENDING DEADLINE FOR FILING  
PLAINTIFF'S AMENDED  
COMPLAINT, FOR FILING  
DISCOVERY PLAN PURSUANT TO  
LR-26(a), AND TO AMEND CAPTION**

COME NOW Plaintiff, KERMIT BAYLESS, by and through his attorneys of record  
STEVEN T. JAFFE, ESQ. of HALL JAFFE, LLP, and DEFENDANTS CLARK COUNTY  
SCHOOL DISTRICT, BRITTNEY NUANEZ, CATHERINE EVANS, SARAH HAMILTON,  
AND ZACHARY HARLAN (hereinafter collectively "Defendants"), by and through their  
counsel of record, CRYSTAL J. PUGH, ESQ., and BETTY J. FOLEY, ESQ., of CLARK

COUNTY SCHOOL DISTRICT OFFICE OF THE GENERAL COUNSEL who hereby respectfully submit this Stipulation and Order to extend the deadline for Plaintiff to file and serve his Amended Complaint, as ordered by this court; to extend the deadline for the parties to conduct a Rule 26 conference and submit a proposed Discovery Plan and Scheduling Order pursuant to LR-26(a); and, to amend the caption to reflect this court's ruling granting Defendants' Motion to Dismiss, in part.

By Order of this court dated March 25, 2025, this court granted Plaintiff's Motion to amend his Complaint, in part in response to Defendant's Motion to Dismiss. At that time, counsel for Plaintiff, upon question from the court as to the amount of time he believed he needed to file the amended Complaint, requested that the court allow until April 30, 2025. In the interim, Plaintiff's counsel submits the following details, as if more fully explained in a Declaration. Counsel for Plaintiff proceeded to trial in the Eighth Judicial District Court, which trial started on April 7, 2025, and went to verdict on April 15, 2025, *Pettinati v. Moseman*, A-836228, in Department 29, prior to which counsel spent substantial time in trial preparation. Thereafter, counsel for Plaintiff's office moved, which move completed on April 19, 2025; however, which also largely disrupted the office's operations and computers through April 21, 2025. Thereafter, counsel for Plaintiff attended a family event out of state, and left on April 24, through April 27. Finally, counsel for Plaintiff is scheduled to mediate a substantial matter on May 6, 2025, before Hon. David Wall, requiring that he submit his mediation brief, a complicated document based on the issues in the case, on April 29, 2025. Consequently, while Plaintiff's counsel submits that he honestly responded to the court when he estimated April 30, 2025, as a reasonable date by which to file the Amended Complaint herein, Plaintiff's counsel submits that he underestimated the commitments he faced in the interim and their time demands.

Plaintiff's counsel is currently involved in the matter, *Ortiz v. 50 Eggs Restaurant Group, etc., et.al.*, Eighth Judicial District Court case number A-850348, in Department 20, which is the oldest case set for trial on a trial stack commencing May 27, 2025, and he must

respond to Motions in Limine by Friday, May 2, 2025. Plaintiff's counsel must also leave Nevada on May 2, 2025, for a family wedding out of state, through May 4. Plaintiff's counsel also has the afore-mentioned mediation on May 6, which will last all day. Consequently, Plaintiff's counsel requests, and the parties stipulate to extend the deadline for filing the Amended Complaint herein until May 9, 2025, and request the court's approval.

The court also scheduled the parties to submit a Discovery Plan and Scheduling Order pursuant to LR-26(a) by May 1, 2025. The parties request and stipulate to an extension of that submission, given Plaintiff's need to file the Amended Complaint and for Defendant to file and serve its Answer thereto, with the court's permission.

Finally, this court granted in part Defendants' Motion to Dismiss Plaintiff's Complaint as to the individual named Defendants only. The parties hereby stipulate to amend the caption to remove the individuals from the caption, as they are no longer parties to this instant action before this court.

**HALL JAFFE, LLP**

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*Attorney for Plaintiff*

**CLARK COUNTY SCHOOL DISTRICT**

By: /s/ Betty J. Foley  
CRYSTAL J. PUGH, ESQ.  
Nevada Bar No. 12396  
BETTY J. FOLEY, ESQ.  
Nevada Bar No. 14517  
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Las Vegas, NV 89146  
*Attorneys for Defendants*

**ORDER**

IT IS SO ORDERED.

Dated this 1st day of May, 2025.

  
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Hon. Maximiliano D. Couvillier III  
United States Magistrate Judge